

MAY 21 2002

K021530

Sterling Medivations, Inc.

66 Neptune Drive
Groton, CT 06340
650-814-4083 (voice)
770-242-8639 (fax)

510(k) SUMMARY

Date Submitted: May 10, 2002

Submitter: Sterling Medivations, Inc. 66 Neptune Drive, Groton, CT 94022
Company Phone 650-814-4083, Company Fax 770-242-8639

Contact: Joel Douglas, Chief Technology Officer
Sterling Medivations, Inc.
Applicant Phone 650-814-4083 or 770-242-8639

Trade Name of Device: Simplicity™ Easy P Soft Infusion Set for infusion and/or injection of fluids into the body below the surface of the skin when attached to an external pump or syringe.

Common Name of Device: Intravascular administration set.
Classification Name: Percutaneous intravascular catheter.

Predicate Device: Simplicity Easy Soft Infusion Set, FDA 510 (k) K020912.

Description of the New Device: Sterling Medivations Inc.'s ("SMI") Simplicity Easy P Soft designed for use by people with diabetes for the infusion and/or injection of fluids into the body below the surface of the skin when attached to a MiniMed Paradigm pump or syringe. It is inserted into the tissue of a patient and the catheter is attached to the infusion device. It is substantially equivalent to the Simplicity™ Easy Soft Infusion Set, K020912 and Soft YP Infusion Set, FDA 510 (k) K011187.

The Simplicity Easy P Soft Infusion Set proposed for commercial distribution is similar in all significant respects to the existing Simplicity Easy Soft Infusion Set, FDA 510 (k) K020912 and it has the same intended use.

The device consists of four main parts: (1) infusion catheters made from Polytetrafluoroethylene (PTFE), (2) an infusion hub that provides the patient the capability of disconnecting the connecting tube from the infusion catheter, (3) a connecting tube and (4) a threaded YP connector.

The Simplicity Easy P Soft Infusion Set is an infusion administration set, connecting to a medicine reservoir or syringe that is placed in an external infusion device and inserted below the surface of the skin of a patient. The SMI Simplicity Easy Soft Infusion Set may be used with any Paradigm infusion device that delivers continuous or intermittent flow.

The administration set attaches to the reservoir/syringe by means of a threaded YP connector, and under the surface of the skin in the patient through an indwelling cannulas formed from PTFE. The connecting tubing is made from a polyethylene tube.

The indwelling cannulas formed from PTFE are introduced below the surface of the skin using an insertion ring with AISI 304 stainless steel needles. The connector needle is attached to the hub fixed to the indwelling catheter. This seal on the connector needle mates with the indwelling catheter hub that forms a seal that permits the infusion of medication without leakage. The connector needle is made from AISI 304 stainless steel and it is connected to the connecting tubing. The connector tubing proximal end is attached to a threaded YP connector for attachment to the Paradigm medicine reservoir.

Intended Use of the New Device: The intended use of the Simplicity Easy P Soft Infusion Set is to provide a means to for infusion and/or injection of fluids into the body below the surface of the skin when attached to a MiniMed Paradigm pump or syringe.

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Comparison of the Technological Features of the New Device and Predicate Device:

The Simplicity Easy Soft Infusion Set proposed for commercial distribution is similar in all significant respects to the existing Simplicity Easy Soft Infusion Set, FDA 510 (k) K020912 and it has the same intended use.

The materials and manufacturing processes are substantially equivalent, the labeling is substantially equivalent and it has the same intended use as the Simplicity Easy Soft Infusion Set.

The differences that exist between the new and predicate device are as follows:

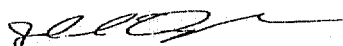
- 1) The Simplicity Easy P Soft Infusion Set indwelling catheter connector is designed for use with the MiniMed Paradigm pump which is equivalent to the YP connector on the Sterling Medivations Simplicity Soft YP Infusion Set K011187.

Performance Data Supporting Substantial Equivalence: To prove substantial equivalence the Simplicity Easy Soft Infusion Set meets the catheter requirements of:

- CDRH 21 C.F.R. Section 880.5440 Intravascular administration set
- ISO 10555 Sterile, single use intravascular catheters (Part 1: General Requirements)
- ISO 10555 Sterile, single use intravascular catheters (Part 5: Peripheral Catheters).
- ISO 11135:1994 Medical devices -- Validation and routine control of ethylene oxide sterilization
- ISO 11138-2:1994 Sterilization of health care products -- Biological indicators -- Part 2: Biological indicators for ethylene oxide sterilization.
- ISO 9626: 1991 Stainless Steel needle tubing for the manufacture of medical devices.
- ISO 11607: 1997 Packaging for terminally sterilized medical devices.
- ISO 8535: 1991 Sterile single use syringes, with or without needle, for insulin.
- FDA Guidelines on validation of the Limulus Amebocyte Lysate (LAL) Test as an end product endotoxin test for human and animal parenteral drugs, biological products, and medical devices.
- ODE Blue Book Memorandum #K90-1.
- ISO 10993-1, Biological evaluation of medical devices - Part 1: Evaluation and testing.

And the design process adhered to is the Center for Devices and Radiological Health. DESIGN CONTROL GUIDANCE FOR MEDICAL DEVICE MANUFACTURERS. This Guidance relates to FDA 21 CFR 820.30 and Sub-clause 4.4 of ISO 9001. This is substantially equivalent to the predicate device.

Signed,



Joel S. Douglas
Chief Technology Officer



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

MAY 21 2002

Mr. Joel Douglas
Chief Technology Officer
Sterling Medivations, Incorporated
66 Neptune Drive
Groton, Connecticut 06340

Re: K021530

Trade/Device Name: Simplicity Easy P Soft Infusion Set
Regulation Number: 880.5440
Regulation Name: Intravascular Administration Set
Regulatory Class: II
Product Code: FPA
Dated: May 10, 2002
Received: May 10, 2002

Dear Mr. Douglas:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies.

510(k) Number (if known):

Device Name: Simplicity Easy P Soft Infusion Set.

Indications For Use:

The intended use of the Simplicity Easy P Soft Infusion Set is to provide a means for infusion and/or injection of fluids into the body below the surface of the skin when attached to a MiniMed Paradigm pump or syringe.

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF
NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ✓
(PER 21 CFR 801.109)

OR

Over-The-Counter Use

(Optional Format 1-2-96)

Patricia Curran

(Division Sign-Off)

Division of Dental, Infection Control,
and General Hospital Devices

510(k) Number 4021530